

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DIVISION)

ELIZABETH KEY,

Plaintiff,

v.

DAVID T. ALLEN,

Defendant.

Civil Action No. 19-cv-02922-TDC

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**RULE 12(b) MOTION TO DISMISS THE  
DEFAMATION COMPLAINT OF PLAINTIFF ELIZABETH A. KEY**

Defendant, David T. Allen, M.D. ("Dr. Allen"), by and through his counsel Booth M. Ripke of Nathans & Biddle, LLP, files this memorandum in support of his F. R. Civ. Pro. Rule 12(b) motion to dismiss the defamation complaint ("Complaint") of Plaintiff, Elizabeth Allen Key ("Ms. Key"), on the grounds of lack of personal jurisdiction (Rule 12(b)(2)) and failure to state a claim (Rule 12(b)(6)).

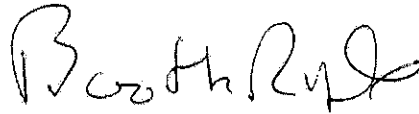
In support of this Motion, Dr. Allen submits the following attached Memorandum of Law and hereby incorporates all arguments from that Memorandum here.

For the reasons stated in this Motion and in the attached Memorandum, Dr. Allen respectfully requests that this honorable Court:

1. Dismiss Ms. Key's Defamation Complaint due to a lack of personal jurisdiction over Dr. Allen, pursuant to Rule 12(b)(2);

2. Dismiss Ms. Key's Defamation Complaint due to a failure to state a proper claim of defamation pursuant to Rule 12(b)(6);
3. Grant this Motion; and
4. Grant other relief as the Court deems necessary and just.

Respectfully submitted,



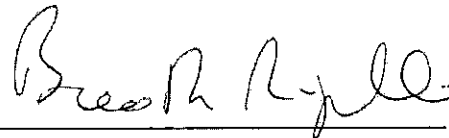
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Dated: November 18, 2019

#### CERTIFICATE OF SERVICE

It is this 18th day of November, 2019, hereby certified that a copy of the attached Motion was delivered by U.S. Mail to the following:

Richard Evans  
2200 Research Blvd., Suite 500  
Rockville, Maryland 20850  
Attorney for Elizabeth Key



Booth M. Ripke